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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)	
)	
Jurisdictional Separations Reform)	CC Docket No. 80-286
And Referral to the Federal-State)	
Joint Board)	
)	
Comments on the Separation)	FCC No. DA 99-2677
Simulation Cost Study Tool)	

COMMENTS
OF THE
UNITED STATES TELECOM ASSOCIATION

The United States Telecom Association (USTA) hereby submits its comments in response to the Commission's Public Notice¹ concerning the request of the State Members of the Federal-State Joint Board on Separations for comment on their Separations Simulations Cost Study Tool (NARUC Cost Study Tool) in the above-captioned proceeding. USTA is the principal trade association of the local exchange carrier (LEC) industry. Its members provide over 95 percent of the exchange carrier-provided access lines in the United States. Incumbent LECs traditionally have been the sole providers of universal service.

USTA appreciates the opportunity to comment on the NARUC Cost Study Tool. The NARUC Tool evaluates changes in the assignment of Internet usage and proposes a new treatment of loops for ADSL services.

¹ *Formal Request from State Members of Federal-State Joint Board on Separations for Notice and Comment on Separations Simulation Cost Study Tool*, Public Notice, FCC DA 99-2677, released December 1, 1999 (Public Notice).

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Although USTA does not disagree with the NARUC alternative regarding the Internet, it does disagree with the assumptions made in the evaluation of ADSL and the combined Internet ADSL scenario. First, the ADSL scenario is contrary to the existing treatment commonly accepted for ADSL. The ADSL scenario assigns all of the cost of a loop to ADSL, which is inconsistent with the generally accepted tariffing treatment, which does not include any incremental cost for the loop. Second, the NARUC assumptions would essentially create an implicit subsidy for the voice services using the message loop by allocating all of the cost for the loop to ADSL, contrary to actions already taken in the universal service docket. Also, combining Internet and ADSL is wrong from the standpoint that the provision of ADSL service is designed, at least in part, to move Internet related traffic off the public switched network and on to the ADSL network.

USTA has also provided a program to evaluate separations changes. The USTA program evaluates and provides results for the following, which have already been addressed to the Joint Board:

- USTA Freeze proposal;
- NARUC three year rolling average;
- Estimate of effects of classifying Internet usage as interstate; and
- Estimate of the effects of changing the gross allocator for loop plant from 25% to 15% or Subscriber Line Usage (SLU) or 40% or 33 1/3%.

Any tool/program needs to be able to evaluate those issues that have already been addressed to the Joint Board or FCC in this Docket. In its current form, the NARUC Tool does not provide a specific worksheet for an evaluation of the USTA Freeze

Proposal or its own three year rolling average. These changes need to be included in any tool/program that evaluates separations changes.

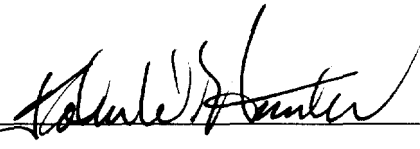
It is important to be able to evaluate a separations freeze, such as that proposed by USTA, for several reasons. First, the idea of a freeze of the separations process has been on the table since comments were initially filed in the Notice of Proposed Rulemaking in this proceeding in 1997. Second, the freeze needs to be evaluated, since it represents an important step in the eventual elimination of the separations process. Rather than “tweaking” individual factors to further the “illusion of precision,” a freeze would be a clear signal about the long term goal of the regulatory process, at least as far as separations is concerned. Second, a freeze would be a significant simplification of the existing process, particularly for those carriers electing the price cap form of treatment and would remove the specter of separations from other regulatory considerations, such as access reform and universal service.

Although USTA has some specific comments and suggestions about the NARUC Separations Simulation Cost Study Tool, which are detailed in Attachment A hereto, it is not felt that these comments would have a significant impact on the use of this Tool or the USTA Program in evaluating change to the separations process. It must be remembered that any tool/program should be used only to evaluate the changes that are being proposed. The tool/program should not be used to drive public policy regarding any changes made to the separations process. In addition, the results produced by these Tools/Programs should only be use to estimate the effects of changes being evaluated. The individual programs in use by the companies are often more detailed and would not produce the same results.

USTA looks forward to working with the Joint Board and the FCC in the further evaluation and simplification of the separations rules for all local exchange carriers.

Respectfully submitted,

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ATTACHMENT A

SPECIFIC COMMENTS

1. Cell E19 on the 'BASE CASE', 'Internet Only', 'Internet and ADSL', and 'ADSL Only' worksheets appears to have an error in the formula. The formula reads; `"=IF('ARMIS 4304'!C23=0,0,(+'ARMIS 4304'!E16/'ARMIS 4304'!C23))"`. The formula should read `"=IF('ARMIS 4304'!C23=0,0,(+'ARMIS 4304'!E23/'ARMIS 4304'!C23))"`

2. Cells D169 and E169 on the 'ARMIS 4304' worksheet references line number "7041" on the 'ARMIS Input Area' worksheet, which is the Weighted Standard Work Seconds used to allocate the Other Telephone Operator Expenses found on line "7040" of the ARMIS 4304. However this allocator is applied to all of the Telephone Operator Expenses found on line "7060" of the ARMIS 4304. Line 7060 is the sum of expenses found on lines 7010, 7020, 7030 and 7040. The allocator for Cells D169 and E169 needs to be changed to include the Weighted Standard Work Seconds found on lines 7011, 7021 and 7031, as well as 7041. The expense allocated by 7041 is only 45% of the total Operator expense found on line 7060, based on the data for all of the ARMIS companies.

3. Cells E98, H98, E99, H99, E100 and H100 calculate factors to allocate Accumulated Depreciation and Depreciation Expense for COE Operator Systems, COE Switching and COE Circuit (Transmission) based on the Data from the ARMIS 4304, Lines 3031, 3021 and 3041, respectively. These values are calculated from Cells K98, N98, K99, N99, K100 and N100. The factors are applied to the Accumulated Depreciation and Depreciation Expense for COE Operator Systems, COE Switching and COE Circuit (Transmission) in the 'BASE CASE', 'Internet Only', 'Internet and ADSL', and 'ADSL Only' worksheets. The amounts do not change even though the underlying allocations of COE Switching and COE Circuit (Transmission) do change with the Internet and ADSL changes being made. It is suggested the Cell references be changed as follows:

K98 = K116

N98 = N116

K99 = Sum(K117:K120)

N99 = Sum(N117:N120)

K100 = Sum(K121:K148)

N100 = Sum(N121:N148)

This would provide for a more representative allocation of Accumulated Depreciation and Depreciation Expense when evaluating changes involving COE.

4. The 'BASE CASE', 'Internet Only', 'Internet and ADSL', and 'ADSL Only' worksheets allocate Current Deferred Taxes and NonCurrent Deferred Taxes based on Telephone Plant In Service (Cells K215, N215, K216 & N216). FCC Part 36 specifies that these accounts should be allocated based on the separations of the related plant accounts, which is shown on the ARMIS 4304. This difference in allocation is at least part of the reason that "\$ Differences" may show up in Cells F128 and F129 of the 'ARMIS 4304' worksheet.

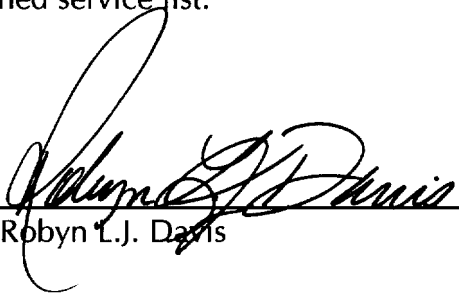
OTHER SUGGESTIONS

1. It would be more convenient to run the tool if the raw data was included. Since the raw data was used to generate the initial set of results, the next version should provide that data. The USTA Separations Reform Analysis Program does provide a copy of the raw data for the ARMIS companies that is necessary to run the USTA Program.

2. The calculation of the separated amounts seems to be more complicated than necessary. Having the calculations be based on a process that multiplies a usage factor times a cost distribution (based on a comparison of "category cost" to the aggregated cost) times an aggregated cost seems to include an extra step in the process, especially since there are no changes made to the cost distribution. The process could be simplified by eliminating the step relating to the aggregated cost, since it is not changed in the process.

CERTIFICATE OF SERVICE

I, Robyn L.J. Davis, do certify that on December 17, 1999 Comments of the United States Telecom Association were either hand-delivered, or deposited in the U.S. Mail, first-class, postage prepaid to the persons on the attached service list.


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